UNITED STATES DISTRICT COURT EASTERN DISTRICT OF VIRGINIA RICHMOND DIVISION

STEVES AND SONS, INC.,)	
	Plaintiff,)	
v.)	Civil Action No. 3:20-CV-00098-REP
JELD-WEN, INC.,)	
	Defendant.)	
)	

JELD-WEN, INC.'S EMERGENCY RULE 62(d) MOTION TO STAY THE INJUNCTION PENDING APPEAL

Pursuant to Federal Rule of Civil Procedure 62(d), Defendant JELD-WEN, Inc. ("JELD-WEN") respectfully requests that this Court stay its preliminary injunction order dated April 10, 2020 (the "Preliminary Injunction Order"), pending resolution of JELD-WEN's appeal of that order to the United States Court of Appeals for the Fourth Circuit. *See* Preliminary Injunction Order, ECF No.123; Notice of Appeal, ECF No.124. A stay is necessary to enable JELD-WEN to seek meaningful interlocutory review of the Preliminary Injunction Order from the Fourth Circuit pursuant to 28 U.S.C. § 1292(a)(1). JELD-WEN further requests that the Court consider this motion on an expedited basis, as JELD-WEN plans to seek emergency relief from the Fourth Circuit in the event this Court declines to grant a stay. JELD-WEN's arguments in support of this motion are set forth more fully in the accompanying memorandum of law.

Dated: April 20, 2020

Respectfully submitted,

JELD-WEN, Inc.

By counsel

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CERTIFICATE OF SERVICE

I hereby certify that on the 20th day of April 2020, the following counsel of record have been served using the CM/ECF system, which will then send a notification of such filing (NEF) to the registered participants as identified on the NEF to receive electronic service, including:

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